

# **Exhibit 7**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

STEVEN HOTZE, M.D.; WENDELL  
CHAMPION; HON. STEVE TOTH; and  
SHARON HEMPHILL,

*Plaintiffs,*

v.

CHRIS HOLLINS, in his official capacity as Harris  
County Clerk,

*Defendants,*

and

MJ FOR TEXAS; DSCC; DCCC; MARY  
CURRIE; CARLTON CURRIE; JEKAYA  
SIMMONS; and DANIEL COLEMAN,

*Proposed Intervenor-  
Defendants*

Civil Action No. 4:20-cv-03709

**DECLARATION OF JEKAYA SIMMONS**

Pursuant to 20 U.S.C. § 1746, I, JeKaya Simmons, declare as follows:

1. My name is JeKaya Simmons. I am over the age of 18, have personal knowledge of the facts stated in this declaration, and can competently testify to their truth.

2. I am a registered voter in Harris County.

3. On October 14, I voted using Harris County's drive-thru voting at the Toyota Center. I had to show my ID and sign the register before I was permitted to vote.

4. I chose to vote using drive-thru voting because Harris County advertised it as an option for voters this year and I believed it was a good option for someone like me. Because of this litigation, I am now worried that my ballot may not be counted even though I did everything the election officials asked of me.

5. I am also seriously concerned that, if this court were to invalidate my legitimate vote, I would have to cast a new ballot to ensure my vote is counted. Because early voting ends today, the only way for me to do that would be to go to my polling place on Election Day. But the whole reason I chose to vote early was to avoid that situation. I have study obligations that would make it difficult to go to the polls and stand in line on Election Day. Moreover, I am very concerned about the risk of being infected with the coronavirus that accompanies standing in line at the polls. That was why I chose the drive-through option in the first place. If I have to go to a polling place on Tuesday to cast a new ballot, I would be forced into a position where I have to choose between my right to vote and my wellbeing.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: October 30, 2020

DocuSigned by:  
*JeKaya Simmons*  
7BDBC90075B74A4...

By: \_\_\_\_\_

JeKaya Simmons